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9 *Designated solely for service pursuant to LR IA 11-1(b)*

10 *Attorneys for Plaintiff Smart Rain Systems, LLC*

11 **UNITED STATES DISTRICT COURT**

12 **IN AND FOR THE DISTRICT OF NEVADA**

13
14 SMART RAIN SYSTEMS, LLC,

15 Plaintiff,

Case No. 2:22-cv-00232-CDS-EJY

16 vs.

17 ROHREN – UND PUMPENWERK BAUER
18 GES M.B.H., and BAUER NORTH
19 AMERICA, INC.,

20 Defendants.

**JOINT STIPULATION AND ~~PROPOSED~~
ORDER TO EXTEND THE DEADLINE
TO RESPOND TO THE COMPLAINT**

(SIXTH REQUEST)

21
22 IT IS HEREBY STIPULATED AND AGREED, by Plaintiff Smart Rain Systems, LLC
23 (“Smart Rain”), and Defendant Bauer North America, Inc. (“Bauer NA”), Defendant Rohren -
24 und Pumpenwerk Bauer Ges.m.b.H. (“Bauer GmbH”) (collectively, “Bauer”), through their
25 respective counsel, that the time for Bauer to respond to the Complaint be extended up to and
26 including January 20, 2023. Bauer’s current deadline to respond to the Complaint is December
27 7, 2022. Plaintiff recently retained new counsel to represent it in this matter, who is working to
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get up to speed and has communicated with counsel for Defendants about resolving this matter. The additional time stipulated to herein will allow the parties additional time to explore a potential early resolution of the claims in this case, especially in light of the attorneys' and clients' schedules given the end of the month holidays.

The reason for the extension is not for purposes of delay or to cause prejudice to any party, but to allow the parties to continue to discuss settlement options. This is the parties' sixth request for such an extension from the Court, having had previous extensions granted on June 3, 2022 [Docket 17], August 4, 2022 [Docket 19], September 7, 2022 [Docket 21] and October 5, 2022 [Docket 25] and November 4, 2022 [Docket 29]. This request complies with Local Rules IA 6-1, IA 6-2, and 7-1.

DATED this 6th day of December, 2022.

RAY QUINNEY & NEBEKER P.C.

/s/ Z. Ryan Pahnke

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Attorneys for Defendants

ORDER

IT IS SO ORDERED.


UNITED STATE MAGISTRATE JUDGE

Dated December 6, 2022